



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500  
DENVER, COLORADO 80202-2466

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MAR 16 1992

Ref: 8HWM-FF

Mr. Gary Baughman  
Colorado Department of Health  
4210 E. 11th Ave.  
Denver, CO 80220

Re: OU 9 Final Workplan

Dear Mr. Baughman:

EPA has completed the review of the revised Final Phase I RFI/RI Workplan for OU 9, the Original Process Waste Lines (OPWL). In general, the workplan adequately addresses EPA's previous concerns outlined in our letter dated January 6, 1992. However, the workplan still needs to include PCBs in the analyte list. If, during the data compilation effort or during stage 1 field sampling activities, it is determined that these contaminants are not present in the OPWL, then there would not be a need for their analysis during subsequent field investigations. In the interest of moving forward with the project, EPA recommends conditional approval of the workplan upon satisfactory resolution of our ongoing discussions with DOE covering site-wide ARARs and inclusion of PCBs in the analyte list.

Subsequent to our letter dated January 6, 1992, the RFP Risk Assessment Technical Working Group met to discuss alternative approaches to conducting Environmental Evaluations (EEs) within the developed area of the plant. EPA expects the OU 9 EE to be performed according to the procedure agreed upon in this meeting; it must comprise 1) a Habitat Survey Report for compliance with the Migratory Bird Treaty Act and Fish and Wildlife Coordination Act; 2) a Biological Survey Report for compliance with the Endangered Species Act; and 3) an evaluation of exposure pathways including a site conceptual model.

In the event that the need to make significant changes to the Field Sampling Plan (FSP) is identified in the course of the data compilation effort or the field work, DOE must submit an addendum to the workplan detailing the required changes. The addendum will be subject to approval under the terms of the IAG covering primary documents, as they are intended to modify an approved workplan which is itself a primary document.

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Please do not hesitate to contact Arturo Duran of my staff  
at (303) 294-1080 with any question or comments you may have.

Sincerely,

A handwritten signature in dark ink, appearing to read "Martin Hestmark". The signature is fluid and cursive, with a large, stylized "M" and "H".

Martin Hestmark, Manager  
Rocky Flats Project

cc: Frazer Lockhart, DOE  
Bruce Thatcher, DOE  
Joe Schieffelin, CDH  
Arturo Duran, EPA